

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

00-0259

AMEREN'S REPSONSE TO QUESTIONS

APRIL 17, 2000

ILLINOIS
COMMERCE COMMISSION

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(The following responses are on behalf of AmerenCIPS and AmerenUE, and are underlined as set forth below)

CHIEF CLERK'S OFFICE

ComEd representatives recently stated during Commerce Commission Electric Policy Meetings and during legislative forums that the provisions of the Electric Service Customer Choice and Rate Relief Law of 1997 (Customer Choice Law) are working well and that there is robust development of retail competition in the ComEd service territory. How are these statements reconciled by ComEd with the filing of this Petition in which ComEd requests a substantial change, on a very expedited basis, in the market value determination?

Ameren's response: Not applicable

The ComEd Petition states that the expeditious approval of this Petition is in the public interest because it will promote the ongoing transition to a fully competitive retail market by providing additional opportunities for savings to customers. (Emphasis added.) Please explain.

* Ameren's response: It is Ameren's view that the greatest impediment to the transition to a fully competitive market in Illinois is due to the flaws inherent in the Neutral Fact Finder process and the fact that such process has set the "market value" too low. The Commission's approval of ComEd's filing of an index-based market value will help to remove that impediment.

Assuming that the summer market value reflected in ComEd's current tariffs is too low and therefore that the current transition charge is too high, and further assuming that ComEd's proposal in this proceeding is not approved, indicate how, if at all, ComEd will propose that its transition charge be changed?

Ameren's response: Not applicable.

Due to the vagaries of the retail electric market and other considerations, what are the benefits and/or detriments to ComEd recommending to the Commission that this tariff be effective for a defined time period rather than for an indefinite time period. And what would be the appropriate defined time period, if any.

Ameren's response: Ameren has no response at this time.

Indicate whether the attorney(s) representing ComEd in this proceeding are also representing Unicom Energy, Inc. in this or any other Commission proceeding. Also, indicate if any other attorney(s) representing a utility in this proceeding are also representing a retail electric supplier (RES) affiliated with that utility in this or any other Commission proceeding; or, if representing a RES in this proceeding, are any such attorney(s) also representing a utility affiliated with that RES in this or any other Commission proceeding.

Ameren's response: the attorney representing Ameren in this proceeding is not representing any RES affiliated with Ameren in this or any other Commission proceeding.

The proposed tariffs contained in the Petition are applicable only to ComEd. Given the current status of competition and choice in Illinois, how, if at all, would the approval of this proposal affect the adoption of market index based tariffs to determine market value by other electric utilities in Illinois as well as the development of retail competition in service territories in Illinois other than the ComEd service territory?

Ameren's response: As noted in Ameren's Petition for Leave to Intervene, ComEd attached to its Petition an affidavit of Mr. Robert J. Mill on behalf of Ameren. In this affidavit, Mr. Mill stated that Ameren planned "to modify its market value (mv) calculation so that our approach will be as similar to ComEd's as is feasible given differences in our relevant markets and operations". Further, Mr. Mill stated that "Ameren plans to file revised tariffs in the coming months to implement this approach". (Affidavit, p. 1)

Thus, in Ameren's view, the approval by the Commission of ComEd's Petition would send a signal that it would be appropriate and desirable for Ameren to file a similar petition.


VERIFICATION

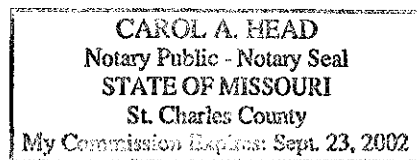
STATE OF MISSOURI)
)
CITY OF ST. LOUIS) SS

I, Joseph H. Raybuck, do state upon oath, that I am an attorney for Central Illinois Public Service Company, d/b/a AmerenCIPS, and Union Electric Company, d/b/a AmerenUE, with authority to file this Response to Questions, that I am familiar with its contents, and that they are true and correct to the best of my knowledge, information and belief.


Joseph H. Raybuck

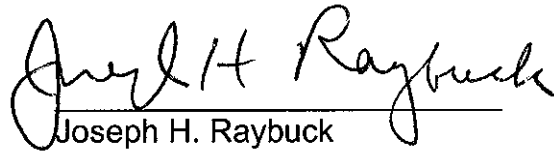
Sworn to before me this 18th day of April, 2000.


Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Questions was served on all parties of record via first class, U.S. mail on this 18th day of April, 2000.



Joseph H. Raybuck

SERVICE LIST
I.C.C. DKT. NO. 00-0259

Donna M. Caton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Larry Jones
Hearing Examiner
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Sanajo Omoniyi
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62794

Carl Peterson
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Steven Revethis
John Feeley
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Bruce Larson
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Robert Bishop
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Eric Schlaf
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Patrick Foster
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Christopher W. Flynn
Karl B. Anderson
Jones Day Reavis & Pogue
77 West Wacker Drive
Chicago, IL 60601

Leijuana Doss
Marie Spicuzza
Assistant State's Attorneys
Environment and Energy Division
69 West Washington, Suite 700
Chicago, IL 60602

Robert Mill
AmerenCIPS
607 East Adams Street
Springfield, IL 62739

Edward J. Griffin
W. Michael Seidel
Defrees & Fiske
200 South Michigan Avenue
Suite 1100
Chicago, IL 60604

Robert Jared, Esq.
MidAmerican Energy Company
106 East Second Street
Davenport, IA 52808

Eric Robertson
Lueders Robertson & Konzen
1939 Delmar Avenue
Granite City, IL 62040

James Hinchliff
Gerard T. Fox
Mary Klyasheff
Tim P. Walsh
Peoples Energy Services Corporation
130 East Randolph Street, 23rd Floor
Chicago, IL 60601

Christopher Townsend
David Fein
Karen S. Way
Piper Marbury Rudnick & Wolfe
203 North LaSalle Street
Suite 1800
Chicago, IL 60601

Susan M. Landwehr
Director – Government Affairs
Enron Energy Services, Inc.
900 Second Avenue South
Suite 890
Minneapolis, MN 55402

James Stamos
Stamos & Trucco
10 North Dearborn
5th Floor
Chicago, IL 60602

Stephen Mattson
Joseph Weber
Mayor, Brown & Platt
190 South LaSalle Street
Chicago, IL 60603

Joseph L. Lakshmanan
Regulatory Services
Illinois Power Company
500 South 27th Street
Decatur, IL 62521

Kent M. Ragsdale
Alliant Energy Corporation
200 First Street, S.E., 12th Floor
Cedar Rapids, IA 52401-0351

Michael A. Munson
Law Office of Michael A. Munson
8300 Sears Tower
233 South Wacker Drive
Chicago, IL 60606

Julie Voeck
Blackhawk Energy Services
N16 W23217 Stone Ridge Drive
Suite 100
Waukesha, WI 53188

Sarah J. Read
D. Cameron Findlay
Courtney A. Rosen
Sidley & Austin
10 South Dearborn
Suite 5400
Chicago, IL 60603

Nicholas T. Shea
Central Illinois Light Co.
300 Liberty Street
Peoria, IL 61602

Rebecca J. Lauer
E. Glenn Rippie
Commonwealth Edison Company
125 South Clark Street
Suite 1535
Chicago, IL 60603

Michael W. Hastings
646 South 6th Street
Frontage Road East
Springfield, IL 62707

Koby Bailey
Director of Regulatory Affairs
Nicor, Inc.
1844 Ferry Road
Naperville, IL 60563

Kathy Lipp
Alliant Energy
222 West Washington Avenue
Madison, WI 53701

Joseph H. Raybuck
Ameren Services Company
1901 Chouteau Avenue
St. Louis, MO 63103-3085

Stan Ogden
Central Illinois Light Company
300 Liberty Street
Peoria, IL 61602-1404

Eric Bramlet
Koger & Bramlet, P.C.
316 ½ Market Street
Mt. Carmel, IL 62863

Alan H. Neff
Ronald D. Jolly
Assistants Corporation Counsel
City of Chicago Department of Law
Suite 900
30 North LaSalle Street
Chicago, IL 60602-2580

Phillip R. O'Connor
Ken Walsh
NewEnergy Midwest, L.L.C.
29 South LaSalle Street
Suite 900
Chicago, IL 60603

Steven Walter
City of Chicago Department of Environment
Suite 2500
30 North LaSalle Street
Chicago, IL 60602-2580

David Vite
Illinois Retail Merchants Association
19 South LaSalle Street
Suite 300
Chicago, IL 60603

Martin R. Cohen
Robert Ivanauskas
Citizens Utility Board
208 South LaSalle Street
Suite 1760
Chicago, IL 60604

Greg Baise
Illinois Manufacturers' Association
303 West Madison
Suite 600
Chicago, IL 60606

Edward Washington, II
R. Lawrence Warren
Mark G. Kaminski
Office of the Illinois Attorney General
Public Utilities Bureau
100 West Randolph Street, 12th Floor
Chicago, IL 60601

Freddie Greenberg
1603 Orrington Avenue
Suite 1050
Evanston, IL 60201

Richard Zuraski
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Richard Favoriti
Kate Siddon
Michelle Mishoe
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Chairman Richard L. Mathias
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Commissioner Ruth L. Kretschmer
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Commissioner Terry S. Harvill
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Commissioner Edward C. Hurley
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Commissioner Mary Frances Squires
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62794

Charles E. Fisher
Executive Director
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601

Tom Ihrig
CMS Energy
One Jackson Square
Suite 1060
Jackson, MI 49201-1406

Mark Radtke
WPS-ESI
President
677 Baeten Road
Green Bay, WI 54304

Tom Kennedy
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Bryan Kimmell
Strategic Energy Management Corp.
28 South Water Street
Suite 204, East Wing
Batavia, IL 60510

Robert Stephens
Brubaker & Associates, Inc.
1215 Fern Ridge Parkway
Suite 208
St. Louis, MO 63141

Lisa Medas
First Energy Services
1910 West Market Street
Akron, OH 44313

Gary Shannahan
Leonard Jones
Mark Peters
Illinois Power Company
500 South 27th Street
Decatur, IL 62527

Connie Clonch
Debra Kutsunis
MidAmerican Energy Company
106 East Second Street
Davenport, IA 52801

Tony Delacluyse
MidAmerican Energy
666 Grand Avenue
Des Moines, IA 50303

Wendy Ito
Nicor Energy
1001 Warrenville Road
Lisle, IL 60532

Frank Huntowski
Scott Fisher
NorthBridge Group
55 Old Bedford Road
Lincoln, MA 01773

Bob Gilpin
James Kaczka
Unicom Energy
2315 Enterprise
Westchester, IL 60154

Peter Scarpelli
Jackie Orren
CILCO
300 Liberty Street
Peoria, IL 61602

Bob Gutschenritter
Alliant Energy
222 West Washington Avenue
Madison, WI 53701

David Linton
Keith Hock
Michael Yuskus
Ameren Corporation
1901 Chouteau Avenue
St. Louis Mo 63103

Mark Eacret
Ameren Energy
1901 Chouteau Avenue
St. Louis, MO 63103

Todd Masten
AmerenCIPS
607 East Adams Street
Springfield, IL 62739

Lonnie Upshaw
Vice President – Operations
Nicor Gas
1844 Ferry Road
Naperville, IL 60563

Conrad R. Riddick
Deputy Corporation Counsel
City of Chicago
30 North LaSalle Street
Suite 1040
Chicago, IL 60602

Bobbi Welch
Jan Gamboa
Peoples Energy Services Corporation
130 East Randolph Street, 23rd Floor
Chicago, IL 60601

Frank Bagot
Mark Ludwig
Dynegy Marking and Trade
1211 West 22nd Street
Suite 804
Oak Brook, IL 60523

Steve Hickey
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Craig Sieben
Sieben Energ Associates
401 North Wabash Ave.
Suite 536
Chicago, IL 60611

Thomas J. Augspurger
NewEnergy Midwest, L.L.C.
29 South LaSalle Street, Suite 900
Chicago, IL 60603

A. Robert Lasich, Jr.
Senior Attorney
MidAmerican Energy Company
800 Ruan Center
666 Grand Avenue
Des Moines, IA 50309